Kris A. McLean Tyson A. McLean Kris A. McLean Law Firm, PLLC PO Box 1136 Florence, Montana 59833

Phone: 406-214-1965 kris@krismcleanlaw.com

Attorneys for Plaintiff Kevin Washington

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA BUTTE DIVISION

Kevin Washington an individual and minority owner of CryptoWatt Investment Partners, LLC sole member of CyproWatt Mining, LLC

Plaintiff,

v.

Matthew Brent Goettsche an individual and majority owner of CryptoWatt Investment Parnters, LLC sole member of CryptoWatt Mining, LLC

Defendant.

Cause No.: CV-20-2-BU-BMM-KLD

MOTION TO ALLOW THE RECEIVER SELL THE ASSETS OF CRYPTOWATT

COMES NOW the Plaintiff, Kevin Washington, and moves this Court to grant the Receiver the power to market and sell the assets of CryptoWatt Investment Partners, LLC the sole member of CryptoWatt Mining, LLC (hereinafter collectively "CryptoWatt") if it is in the best interest of CryptoWatt

after reasonable notice to the parties and approval by the Court. The grounds for Plaintiff's motion are set forth in his Brief in Support of Motion to Allow the Receiver Sell the Assets of CryptoWatt filed with this Motion. Plaintiff's counsel has contacted counsel for the Defendant who relates that Mr. Goettsche objects to this motion.

DATED this 4th day of March, 2020.

KRIS A. MCLEAN LAW FIRM, PLLC

/s/Kris A. McLean Kris A. McLean Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of March 2020, the foregoing document was served on the following individuals by ECF filing:

John E. Smith Smith & Stephens, P.C. 315 West Pine Street Missoula, Montana 59802 john@smithstephens.com Nick K. Brooke Smith & Stephens, P.C. 315 West Pine Street Missoula, Montana 59802 nick@smithstephens.com

/s/ Kris A. McLean
Kris A. McLean
Kris A. McLean Law Firm, PLLC
Attorney for Plaintiff Kevin Washington